

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Ferro Corporation
1301 North Flora Street
Plymouth, IN 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-7538-00025	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 14, 1999
1 st Significant Permit Modification No.: 099-11830-00025	Pages Affected: 30 & 31
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Mixer M1	1.90	6.30
Mixer M2	1.60	5.62
Mixer M3	0.25	1.62
Mixer M4	0.25	1.62
Mixer M5	1.00	4.10
Mixer M6	1.00	4.10
Mixer M7	1.60	5.62
Mixer M8	3.00	8.56
Mixer M9	3.90	10.20
Mixer M10	5.50	12.85
Mixer M11	2.50	7.58
Mixer M12	2.00	6.52
Mixer M13	0.50	2.58
Mixer M14	0.25	1.62
Mixer M15	1.50	5.38
Mixer M16	2.50	7.58
Mixer M17	2.50	7.58
Mixer M18	1.50	5.38
Mixer M30	2.00	6.52

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound emissions for the most recent twelve (12) month period.

D.1.6 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the mixers (M11, M12, M16 and M17) are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1.
- (1) The amount and emission factor of each product manufactured and solvent used. Records shall include purchase orders and invoices necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to product and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Ferro Corporation
Source Location:	1301 North Flora Street, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3087
Operation Permit No.:	T 099-7538-00025
Operation Permit Issuance Date:	December 14, 1999
1 st Significant Permit Revision) No.:	099-11830-00025
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a permit modification application from Ferro Corporation issued Part 70 099-7538-00025 for the liquid coatings and dispersions production plant. The source's requests for a permit modification is as follows (changes are bolded and deletions are struck-through for emphasis):

Source's Requests:

The source requests that the requirements to do further testing to verify the VOC emission factor be deleted from Condition D.1.5 of the issued Part 70 permit. In our comments to the proposed Part 70 permit, the source proposed to use the slightly higher AP-42 emission factor for surface coating production in lieu of the emission factor developed specifically for the source's Gelcoat production operation to calculate monthly VOC input limit.

IDEM, OAM used the AP-42 emission factor in the calculations instead of the source's emission factor, and deleted the initial testing requirements to verify the emission factor, however the requirements for the periodic testing was left out in Condition D.1.5 of the issued Part 70 permit.

IDEM, OAM Response:

Since the AP-42 emission factor was utilized to calculate the VOC emission from the production of gelcoat, it is not necessary to do an initial stack testing to validate it nor it is necessary to do a periodic stack testing, because the gelcoat production demonstration of compliance with the VOC limit will be accomplished using the AP-42 emission factor (lb of VOC/lb gelcoat mixed) and the weight of the gelcoat throughput. It was the intention of IDEM, OAM to delete this periodic testing requirements, because the TSD Addendum has deleted the condition that requires it, but was overlooked when the final Part 70 permit was issued. Condition D.1.5 of the issued Part 70 permit will be deleted as follows:

D.1.5 Volatile Organic Compounds (VOC)

~~Compliance with the VOC content and emission limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using emission factors recorded during the most recent VOC stack test conducted. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

All subsequent conditions in Section D.1 are re-numbered accordingly.

History

On January 31, 2000 Ferro Corporation submitted an application from the OAM requesting the deletion of the periodic stack testing requirements in the Part 70 permit 099-7538-00025, issued on December 14, 1999.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 31, 2000.

The changes will not result in any pollutant emissions nor it will result in any new applicable requirements.

Justification for the Level of Approval

This modification is being performed pursuant to 326 IAC 2-7-12(d) Significant Permit Modification, which consists of the relaxation of an existing term or condition in the issued Part 70 permit.

Conclusion

The operation of this liquid coatings and dispersions production plant shall be subject to the conditions of the attached **Significant Part 70 Permit Modification No. 099-11830-00025**.